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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

JUN 19 1995

Honorable Fred Thompson  
United States Senate  
Washington, D.C. 20510

Dear Senator Thompson:

Thank you for your inquiry of May 30, 1995, on behalf of Mr. Jim Reed III concerning the Environmental Protection Agency's (EPA) enforcement action at the John P. Saad Site ("Site") in Nashville, Tennessee. This letter addresses the primary concerns apparent in Mr. Reed's letter.

As Mr. Reed points out, the physical area of the Saad Site is relatively small. It is also true, however, that more than five million gallons of waste oil was processed at the Site, and a large volume of this was apparently poured directly into a twelve foot deep "sinkhole" on the property. As you may know, in addition to cancer-causing petroleum constituents, such as benzene, waste oil also contains other toxic and carcinogenic substances, such as lead and other metals. This mismanagement of waste oil resulted in serious environmental problems both on the Site and in the ground water surrounding the Site.

The State of Tennessee turned the Site over to EPA in 1990 after it unsuccessfully tried to compel cleanup by the owners. On April 11, 1990, EPA entered into an administrative order on consent (AOC) with a group of approximately 100 Potentially Responsible Parties (the "Committee"). Under the first AOC, the committee removed and disposed of drums, tanks and their contents. Under the same order, the Committee performed a study which showed the need for additional removal activities.

The Committee removed some of the contaminated soil from the Site under the first AOC and subsequently removed additional soil under a second AOC. As the activities under the first two AOCs did not remove the entire source, additional removal activities were conducted under a third AOC by the Committee and under a separate AOC by ALCOA. Despite the removal of large volumes of soil under these actions, contaminated sludge remains in the ground, in contact with the ground water.

In the past agreements with the Committee, EPA allowed the contaminated soil to be removed in phases. This was done as an accommodation to the Committee. As a result of this approach, none of the past removal actions have been successful in removing the entire source of the ground water contamination. The

resulting duplication of effort and cost could have been avoided had the removal been completed in one phase. From the beginning, Region 4 and the State favored the single phase approach.

The contaminated material that remains in contact with the ground water is causing the chemicals to migrate from the Site onto other property. Results from EPA's studies indicate that the contamination has migrated into nearby Brown's Creek and to Croft Springs (Grassmere Wildlife Park) where animals, including endangered species, are being exposed. Human exposure is also probable on the Site where the Site owner is conducting a business.

I hope this letter will be helpful in responding to your constituent. If I may be of further assistance, please do not hesitate to contact me.

Sincerely yours,

*John H. Hankinson, Jr.*  
for John H. Hankinson, Jr.  
Regional Administrator